

To: Minor, Dustin[Minor.Dustin@epa.gov]
Cc: martha.mann@usdoj.gov[Martha.Mann@usdoj.gov]; Augustini, Michael (ENRD)[Michael.Augustini@usdoj.gov]; Friedman, Henry (ENRD)[Henry.Friedman@usdoj.gov]; Cohen, Adam[Adam.Cohen@dgsllaw.com]
From: Cohen, Adam
Sent: Wed 1/31/2018 9:24:39 PM
Subject: RE: Call this afternoon
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Dusty - This was a pretty rushed drafting exercise, and I have not had time to review any of the suggested language with my client, but here are my proposed revisions to the draft you sent earlier. Changes appear in ¶ 12, the definition of Settling Party's Past Response Costs, ¶ 29, and ¶ 34. Additional changes may be needed after I review this with ARC, but I understand EPA's and DOJ's interest in expediency, so I am sending it now with that reservation.

I am supposed to join another call starting at 2:30 Mountain, but I can delay that call if you and the DOJ lawyers want to discuss this in the next 10 or 15 minutes.

Adam S. Cohen • Partner

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From: Minor, Dustin [mailto:Minor.Dustin@epa.gov]
Sent: Wednesday, January 31, 2018 2:07 PM
To: Cohen, Adam <Adam.Cohen@dgsllaw.com>
Cc: martha.mann@usdoj.gov; Augustini, Michael (ENRD) <Michael.Augustini@usdoj.gov>; Friedman, Henry (ENRD) <Henry.Friedman@usdoj.gov>
Subject: RE: Call this afternoon

Adam,

DOJ is available, and I am copying them on this message, but requested a few minutes to review your proposed language before talking. Could we talk 15 minutes after you send it?

Dusty

Dustin Minor

Assistant Regional Counsel

(415) 972-3888

From: Cohen, Adam [<mailto:Adam.Cohen@dgsllaw.com>]
Sent: Wednesday, January 31, 2018 12:53 PM
To: Minor, Dustin <Minor.Dustin@epa.gov>
Subject: RE: Call this afternoon

Looking at it now. Was in meetings this morning. Could we talk at 1:15 Pacific? I'll try to have a draft response (still subject to client review) ready by then.

Adam S. Cohen ■ **Partner**

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From: Minor, Dustin [<mailto:Minor.Dustin@epa.gov>]
Sent: Wednesday, January 31, 2018 1:37 PM
To: Cohen, Adam <Adam.Cohen@dgsllaw.com>
Subject: Call this afternoon

Adam,

Do you think you will have time to review the language today and do a call with DOJ by COB Eastern Time today? If so, can you propose a time and I can check with DOJ on

their availability.

Thank you.

Dusty

Dustin Minor

Assistant Regional Counsel

(415) 972-3888

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